

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EMERGENCY PLANNING & COMMUNITY RIGHT-TO-KNOW
INSPECTION REPORT**

INSPECTION REPORT COVER SHEET

FACILITY NAME & ADDRESS Enkei America, Inc. – IPC 2680 Norcross Drive Columbus, Indiana 47201	INSPECTION START DATE/TIME April 05, 2018, at 8:30 p.m.	TYPE OF EPCRA INSPECTION 311 312
	INSPECTION END DATE /TIME April 05, 2018, at 12:30 pm	EPA FACILITY IDENTIFIER #
EPA INSPECTOR IN CHARGE James Entzminger	TITLE EPCRA Inspector	PHONE NUMBER (312) 886-4062
OTHER EPA INSPECTOR PRESENT Robert Mayhugh Xiaomi Zhang	TITLE Inspector EPCRA In-Training Inspector	PHONE NUMBER (312) 886-5929 (734) 692-7624
FACILITY REPRESENTATIVES Rick Merkel Timothy S. Fields Kyle Zollman Jason Jones	TITLES Chief Operating Officer General Manger Assistant General Manager Environmental Manager	PHONE NUMBERS (812) 343-0486 (812) 343-5669 (812) 350-0660 (812) 350-3534
OTHER INDIVIDUAL PRESENT Holly Argiris, P.E.	TITLE Senior Project Manager	PHONE NUMBER (317) 816-7301

DESCRIPTION OF FACILITY

Enkei America, Inc. - IPC is located in a mixed industrial and agricultural area of Columbus, Indiana (Attachment 1). Interstate 65 is about 1,500 feet west of the facility. There are residential dwellings located about 4,000-feet northeast from the facility and about 5,000 feet northwest.

The IPC facility is owned and operated by Enkei America, Inc. and is separated from the main buildings of Enkei America, Inc. The IPC facility is a building with a computer server room, a backup natural gas-powered generator, and some additional storage space.

OPENING CONFERENCE

James Entzminger, EPA EPCRA Inspector, Robert Mayhugh, EPA Inspector, and Xiaomi Zhang, SEE EPCRA-In-Training Inspector met with Rick Merkel, Chief Operating Officer, Timothy S. Fields, General Manager,

Kyle Zollman, Assistant General Manager, Jason Jones, Environmental Manager, and Holly Argiris, Senior Project Manager, Environmental Resources Management, for the opening conference. James Entzminger and Robert Mayhugh presented their EPA Inspector Credentials. James Entzminger presented the Notice of Inspection form and the signed form is Attachment 2. Rick Merkel acknowledged receiving the EPCRA inspection announcement letter that explained the purpose of the inspection (Attachment 3). James Entzminger provided an overview of the inventory and release reporting requirements of EPCRA. Timothy S. Fields and Rick Merkel provided the facility description and the processes overview. James Entzminger provided the Confidential Business Information overview and how EPA manages information that is identified as confidential.

James Entzminger requested a site map (Attachment 4). Rick Merkel and Jason Jones presented the site map. The Inspection Chemical Inventory Form was not completed at the time of the inspection. James Entzminger asked about the IPC facility and James Entzminger explained why the IPC facility should be considered as another facility from Enkei America, Inc. James Entzminger requested a site tour and to take pictures. The pictures taken during the site tour are Attachment 5. Rick Merkel granted these requests. James Entzminger asked about any safety equipment needed for the site tour and Timothy S. Fields indicated for personal protective equipment that only ear plugs and safety glasses were required.

INSPECTOR'S FINDINGS

Timothy S. Fields, Kyle Zollman, Jason Jones, and Holly Argiris accompanied James Entzminger, Robert Mayhugh, and Xiaomi Zhang around during the site tour. The IPC facility is a computer server room in which the servers provide computing power to the plants and facilities owned by Enkei America, Inc. During the site tour, James Entzminger, Robert Mayhugh, and Xiaomi Zhang observed batteries used by the servers and a natural gas powered backup generator. Enkei America, Inc. – IPC did not provide the maximum amount of sulfuric acid in the lead-acid batteries that were inside the computer server at the time of the inspection.

On June 21, 2018, Jason Jones provided the maximum amount of the batteries in the computer servers as each battery weight is 64 pounds and there are 10 batteries at Enkei America, Inc. – IPC. The total amount of sulfuric in in each battery is 0.31 gallons. The total battery weight equals $(64 \text{ pounds})(10 \text{ batteries}) = 640$ pounds. The total amount of sulfuric acid equals $(0.31 \text{ gallons})(10 \text{ batteries}) = 3.1$ gallons. The total wright of sulfuric acid equals $(3.1 \text{ gallons})(1.84 \text{ specific gravity})(8.34 \text{ pounds per gallon of water}) = 47.57$ pounds. The total amount of sulfuric acid on-site is less than the 500-pound reporting threshold.

James Entzminger used the EPCRA INSPECTION REPORT (302-312) as an instrument to guide the inspection and made notes on the form Attachment 6.

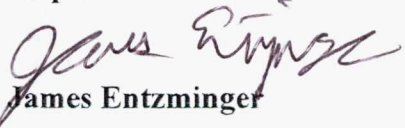

Xiaomi Zhang used the EPCRA INSPECTION REPORT (302-312) as an instrument to guide during the inspection and made notes on the form Attachment 7.

CLOSING CONFERENCE

James Entzminger, Robert Mayhugh, and Xiaomi Zhang met with Rick Merkel, Timothy S. Fields, Kyle Zollman, Jason Jones, and Holly Argiris to review documents and for closing conference. James Entzminger, Robert Mayhugh, and Xiaomi Zhang reviewed the facility chemical inventory inspection form and Safety Data

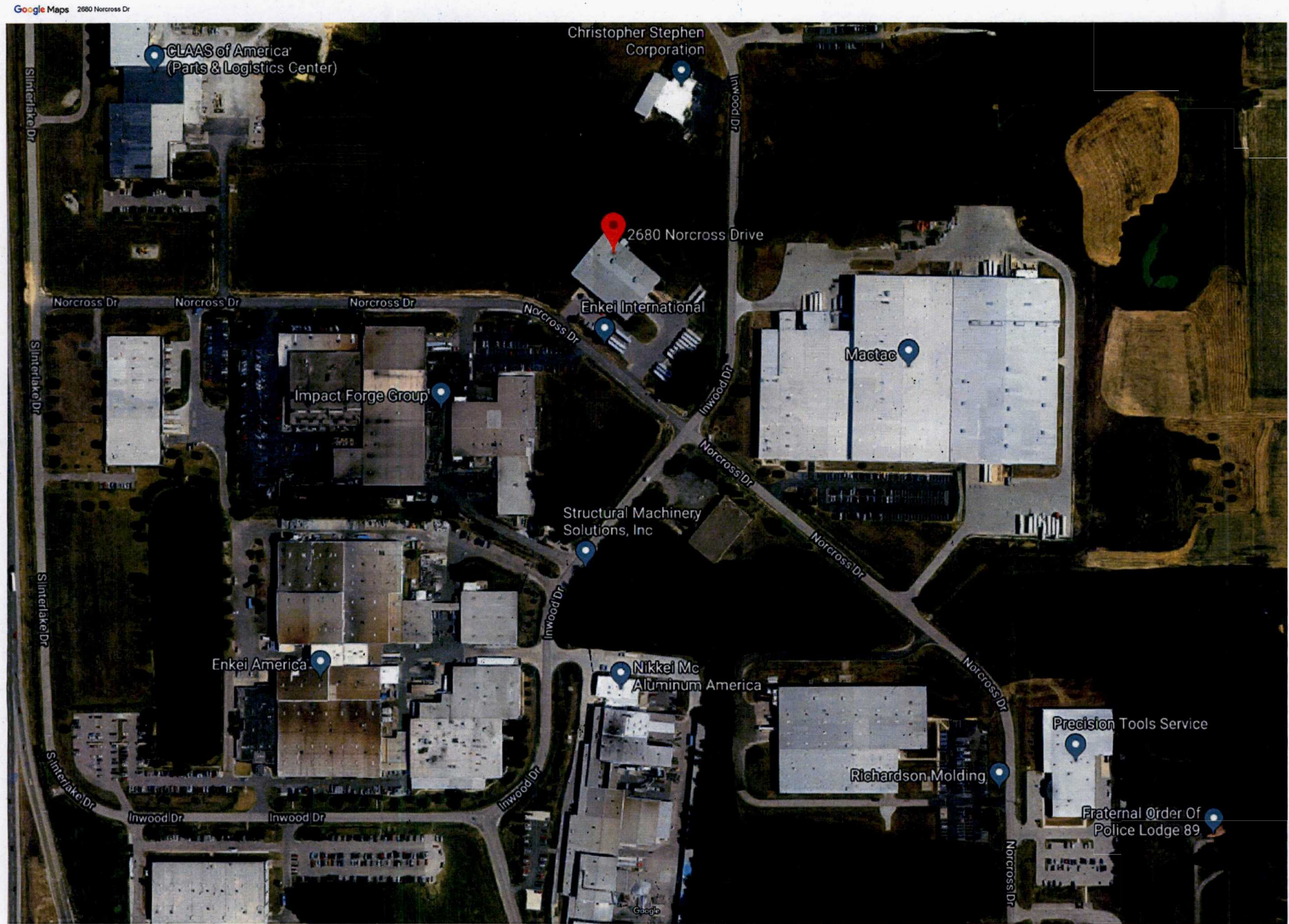
Sheets provided by Jason Jones. James Entzminger mentioned that, as a separate facility, Enkei America, Inc. needs to report chemical inventory separately for IPC facility when the maximum amounts at any one time exceeds the reporting threshold. The Inspection Chemical Inventory Form for Enkei America, Inc. is included in separate report.

James Entzminger explained under what circumstances, hazardous chemicals can be exempted from the inventory reporting under Sections 311 and 312 of EPCRA.

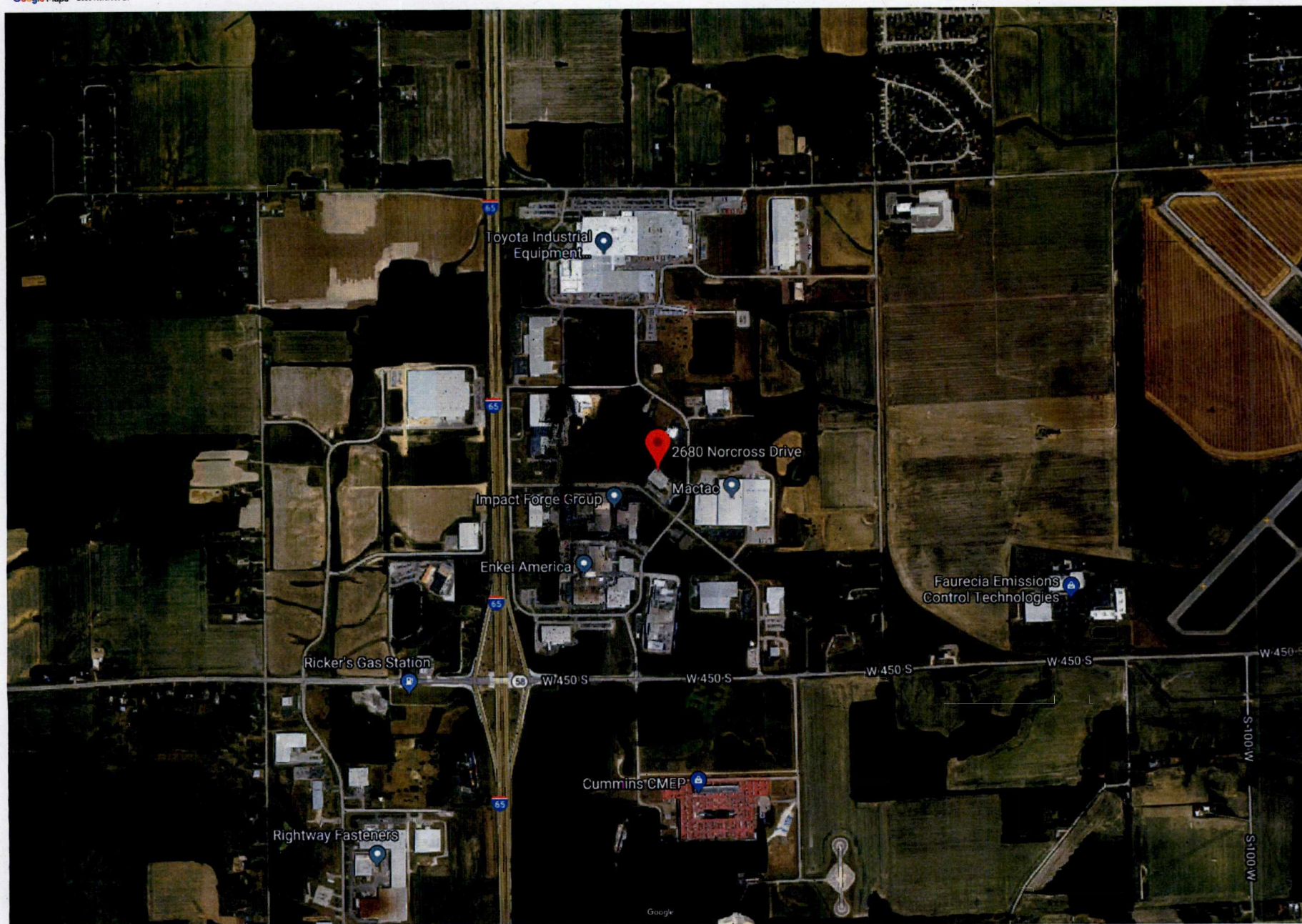
Names and Signature of Inspector  James Entzminger	Agency/Office/Telephone Number US EPA/CEPPS (312) 886-4062	Date June 21, 2018
Name and Signature of Reviewer Michael E. Hans 	Agency/Office USEPA/Region 5/ Chief CEPPS	Date 6-26-18

Attachments:

- Attachment 1 – Aerial Map of the site from Google maps
- Attachment 2 - Notice of Inspection
- Attachment 3 – Inspection announcement letter
- Attachment 4 - Site plan
- Attachment 5 – Photographs
- Attachment 6 – EPCRA Inspection report check sheet (Entzminger)
- Attachment 7 – EPCRA Inspection report check sheet (Zhang)



Google Maps 2680 Norcross Dr



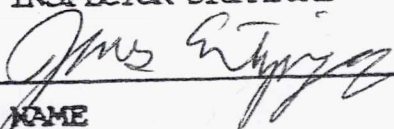



NOTICE OF INSPECTION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and the
Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.	9:15 AM	Enkei America Incorporated
4. INSPECTOR ADDRESS United States Environmental Protection Agency Region 5 77 West Jackson Boulevard Chicago, Illinois 60604			5. FIRM ADDRESS 2900 West Inwood Dr. Columbus, IN	

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with the Emergency Planning and Community Right-to-Know Act of 1986 and Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.

INSPECTOR SIGNATURE 		RECIPIENT SIGNATURE 	
NAME James Entzinger		NAME Jason Jones	
TITLE EPS	DATE SIGNED 4/5/18	TITLE Environmental manager	DATE SIGNED 4/5/18



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 15 2018

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jason Jones
Environmental Health and Safety Manager
Enkei America Incorporated
2900 West Inwood Drive
Columbus, Indiana 47201-9758

Dear Mr. Jones:

Per your phone conversation of March 14, 2018, with James Entzminger of my staff, you have agreed to the inspection of your facility by the U.S. Environmental Protection Agency, Chemical Emergency Preparedness and Prevention Section plans on conducting an inspection at your facility. The purpose of this inspection is to determine your history of compliance with Sections 302-312 of the Emergency Planning and Community Right-to-Know Act (EPCRA). The rescheduled date and time of the inspection will be April 5, 2018, at 8:30 a.m.

Mr. James Entzminger, Robert Mayhugh, and Xiaomi Zhang will be conducting the EPCRA inspection of your facility. Xiaomi Zhang assists the EPA, as part of the Senior Environmental Employment (SEE) Program. As part of the technical assistance provided to the Agency, he provides inspection services under my direction, pursuant to EPCRA (SARA Title III). SEE enrollees are authorized by the EPA to have access to Confidential Business Information, and sign a Non-Disclosure Agreement regarding any such information.

A facility is subject to the requirements of Sections 311 and 312 if the owner/operator is required to prepare or have available a Material Safety Data Sheet (MSDS) for a hazardous chemical under the Occupational Safety and Health Act (OSHA) of 1970 and if the hazardous chemical is present in an amount in excess of the threshold established for such chemical. The reporting requirement covers each hazardous chemical present at the facility at any one time in an amount equal to or greater than 10,000 pounds, and for each extremely hazardous substance present at the facility in an amount greater than or equal to 500 pounds or the threshold planning quantity, whichever is lower.

We provided you the documents previously including Tier Two Form, SARA Title III Fact Sheet, Title III List of Lists, CERCLA Fact Sheet, Small Business Information Sheet, and Inspection Chemical Inventory Form. Read the documents thoroughly and review your storage quantities so that you will be prepared to provide the appropriate information for this inspection. Please be prepared to make the following information available at the time of the inspection:

- A copy of your site plan which discusses the actions your facility would take in case of an emergency.
- A diagram of your facility, including the locations of any hazardous chemical.
- Copies of your Tier Reports, if appropriate, for calendar year 2014 through 2017.
- Copies of your Form R Reports under EPCRA Section 313, if appropriate, for calendar year 2014 through 2016.
- Invoices, inventory records, or other documents such as a list of chemicals and maximum quantities stored at any one given time during each of the previous three calendar years.
- Material Safety Data Sheets for all hazardous chemicals used/stored at your facility.
- Please fill out the Inspection Chemical Inventory Form that was previously provided to you and have it available for the inspectors at the time of the inspection.

The EPA inspectors will also interview employees who have knowledge regarding the use, manufacturing, production, or storage of the hazardous chemicals, and intends to take pictures of any and all chemicals and quantities stored during the time of the inspection.

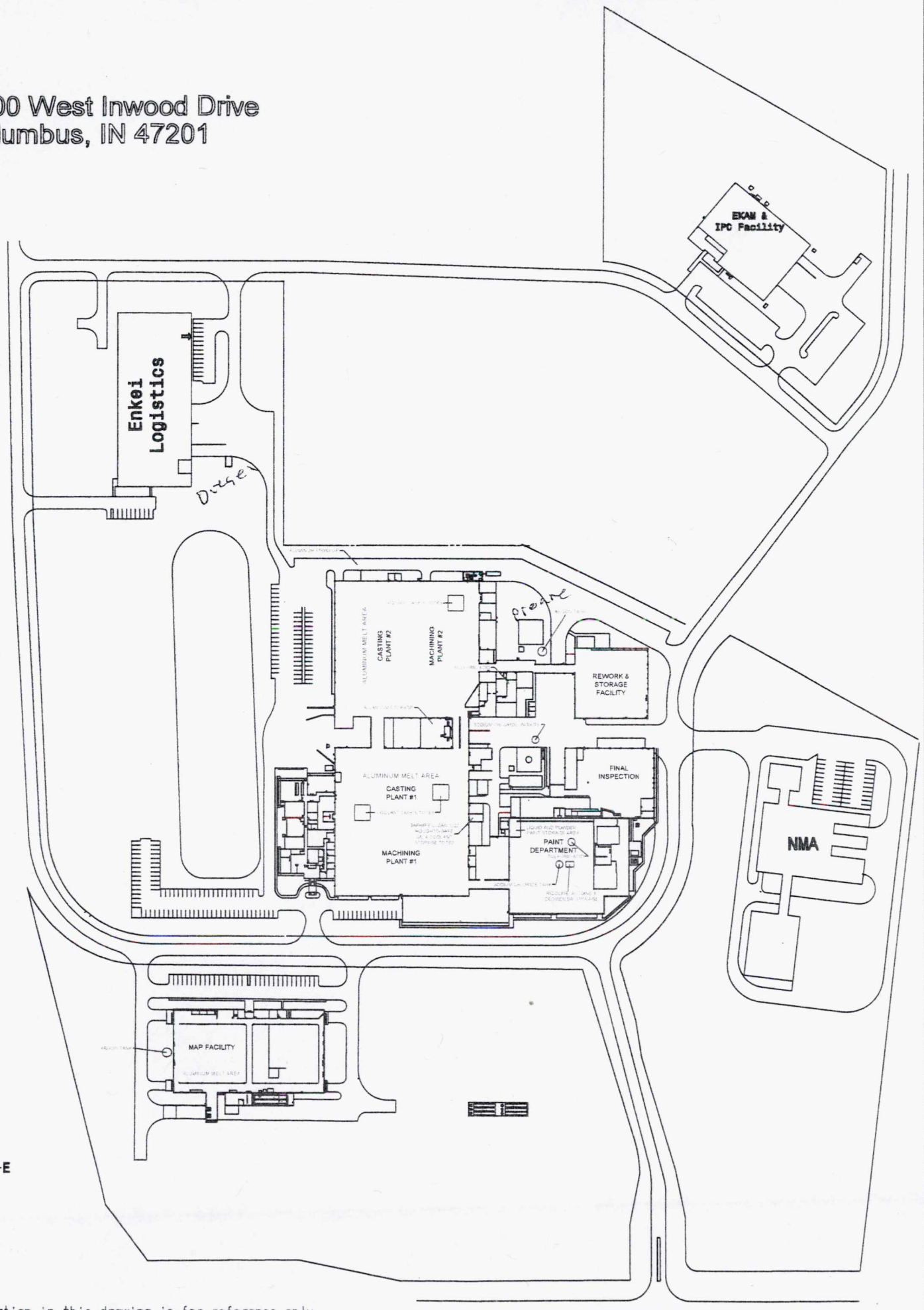
If you have any questions regarding this letter or the inspection, please contact Mr. James Entzminger at (312) 886-4062 or Mr. Robert Mayhugh at (312) 886-5929, or Mr. Xiaomi Zhang at (734) 692-7624.

Sincerely,



Michael E. Hans, Chief
Chemical Emergency Preparedness
and Prevention Section

2900 West Inwood Drive
Columbus, IN 47201



The information in this drawing is for reference only.

PHOTO LOG

Facility: Enkei America, Inc. – IPC Facility. 2680 Norcross Drive, Columbus, IN 47201

Inspector: James Entzminger



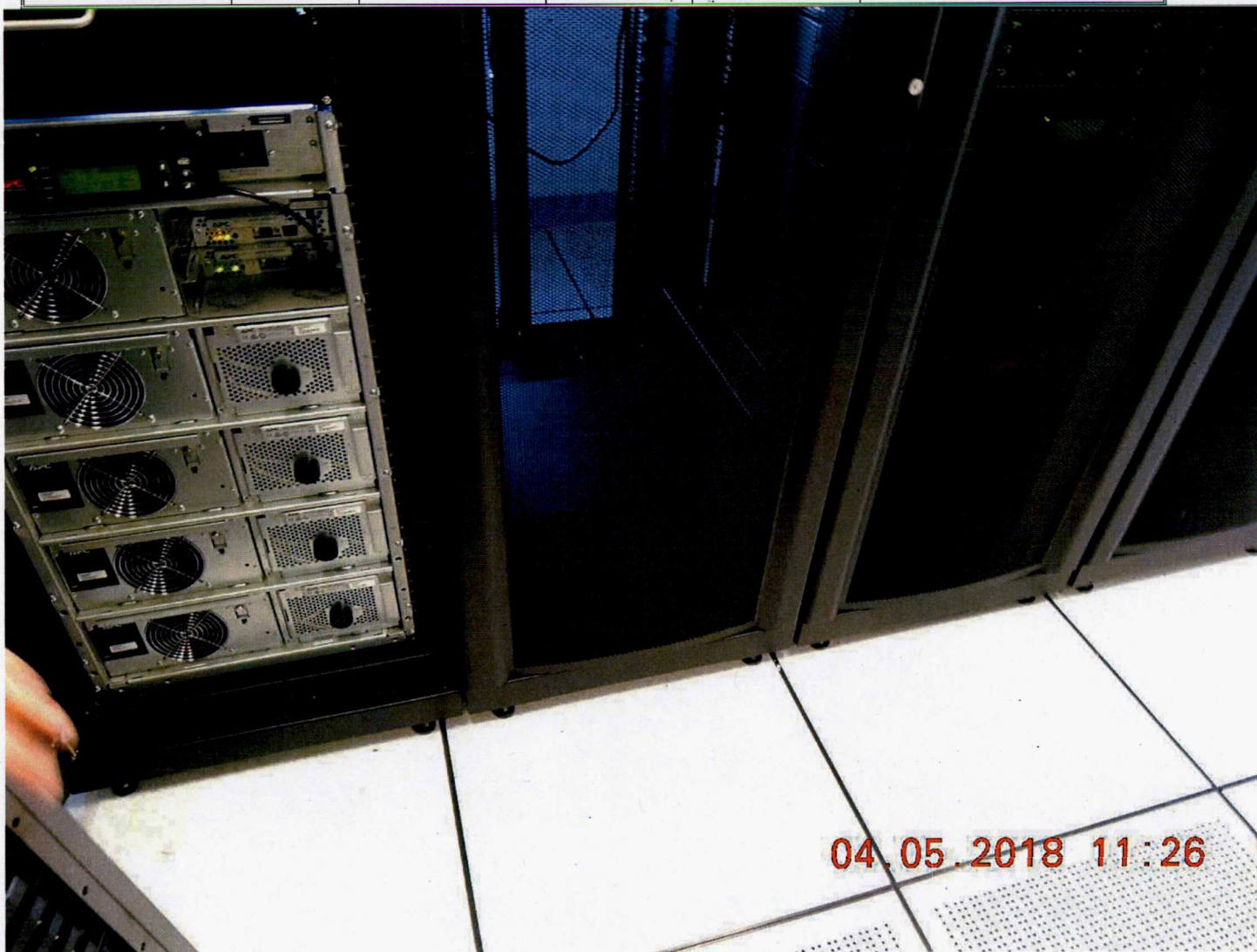
Picture #	Date	Time picture taken	Object being photographed	Position from where photo was taken	Specific place at facility where photo was taken	Name of person taking the picture	Names of witnesses present when photos were taken	Thumbnail
1	04/05/2018	11:26 am	Batteries in Mainframe	South	IPC	Xiaomi Zhang	James Entzminger Robert Mayhugh	
2	04/05/2018	11:29 am	Power Generator	West	IPC	Xiaomi Zhang	James Entzminger Robert Mayhugh	
3								
4								
5								
6								
7								
8								
9								

PHOTO LOG

Facility: Enkei America, Inc. – IPC Facility. 2680 Norcross Drive, Columbus, IN 47201

Inspector: James Entzminger

ATTACHMENT # 5					
PHOTOGRAPHS					
SUBJECT: Batteries in Mainframe (server room)					
FACILITY: Enkei America, Inc. – IPC Facility, Columbus, Indiana					
PHOTOGRAPHER Xiaomi Zhang			WITNESSES James Entzminger/Robert Mayhugh		
DATE April 05, 2018	TIME 11:26 a.m.	DIRECTION South	CAMERA Nikon	FILM Digital	PHOTOGRAPH NO. 1



ATTACHMENT # 5					
PHOTOGRAPHS					
SUBJECT: Power Generator (server room)					
FACILITY: Enkei America, Inc. – IPC Facility, Columbus, Indiana					
PHOTOGRAPHER Xiaomi Zhang			WITNESSES James Entzminger/Robert Mayhugh		
DATE April 05, 2018	TIME 11:29 a.m.	DIRECTION West	CAMERA Nikon	FILM Digital	PHOTOGRAPH NO. 2

